IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

W.C. HERAEUS GMBH & Co. KG (a German corporation), and HERAEUS INCORPORATED (a Delaware corporation) Plaintiffs, v. MARJORIE JOY LYNN as Personal Representative for the ESTATE OF DAVID MARK LYNN and as Trustee of the MARK AND MARJORIE LYNN REVOCABLE TRUST, LYNN PLASMA, INC. (an Idaho corporation), and NXEDGE, INC. (a Delaware corporation), Defendants.	)	C.A. No. 04-904 (KAJ)

PLAINTIFFS' NOTICE OF VIDEOTAPED DEPOSITION OF KATHLEEN SLEEGER UNDER FED. R. CIV. P. 45

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that Plaintiffs W.C. Heraeus GmbH and Heraeus Incorporated, by their attorneys, will take the deposition upon oral examination of third party Kathleen Sleeger. The deposition will proceed pursuant to Rule 45 of the Federal Rules of Civil Procedure, as well as the Subpoena in a Civil Case filed concurrently herewith. Ms. Sleeger's home address is 14720 SW 100th Avenue, Portland, OR 97224.

The deposition will take place at Beovich, Walter & Friend, 1001 SW 5th Avenue, Portland, OR 92704, on August 18, 2005 commencing at 10:00 a.m., or at such other time and location as mutually agreed upon, and will continue from day to day until completed. The deposition will be taken before an officer authorized to administer an oath. Testimony will be recorded by stenographic, videographic, real time and audio/video means (*e.g.*, Live Note). The

deposition will be taken for the purpose of discovery, for use at trial in this matter, and for any other purpose permitted under the Federal Rules of Civil Procedure.

Please take further notice the documents identified in Attachment "A" to the Subpoena shall be produced by Ms. Sleeger on or before August 8, 2005 at the offices of Beovich, Walter & Friend, 1001 SW 5th Avenue, Portland, OR, 92704.

July 18, 2005

MORRIS, NICHOLS, ARSHT & TUNNELL

/s/ Leslie A. Polizoti

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CERTIFICATE OF SERVICE

I hereby certify that on July 18, 2005, I electronically filed the foregoing document with the Clerk of Court using CM/ECF, which will send notification of such filing to Kevin M. Baird and Karen Jacobs Louden.

I also certify that on July 18, 2005, I caused to be served true and correct copies of the foregoing document on the following in the manner indicated below:

BY HAND

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